

EXHIBIT CRA-2

EnerBank's Current CRA Policy

The following pages contain EnerBank's current CRA policy.



Salt Lake City, Utah • Jackson, MI • Cary, North Carolina

COMMUNITY REINVESTMENT ACT POLICY

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1.1 INTRODUCTION

The Community Reinvestment Act (CRA) was implemented by the Federal Reserve as Regulation BB in 1977 following the congressional adoption of Title VIII of the Housing and Community Development Act of 1977 with revisions being adopted in 1989, 1995 and 2005. Its purpose is to encourage banks to meet the credit and financial needs of their individual communities in terms of community development and credit availability for low- and moderate-income consumers and small, minority or women-owned businesses while maintaining their business strategies. CRA neither prohibits any activities nor requires specific allocation of credit. CRA specifically encourages financial institutions to meet local credit needs in a manner consistent with safe and sound lending practices.

The Board of Directors of EnerBank USA ("EnerBank") understands and recognizes their responsibilities regarding CRA and has adopted the following policy to comply with Regulation BB.

1.2 DELINEATION OF EnerBank USA ASSESSMENT AREA

The Board of Directors has delineated EnerBank's assessment area as the entire county of Salt Lake, Utah. This assessment area was delineated based on the Bank's size, lending expertise, and competition. The delineation of this assessment area does not reflect any illegal discrimination nor does it exclude low or moderate-income geographies. A map of the Bank's assessment area is included in this CRA Policy and is attached as Exhibit A.

1.3 COMMUNITY REINVESTMENT ACT NOTICE

It is the policy of EnerBank to comply with all requirements of the CRA. This includes displaying a copy of the CRA Notice in the lobby of the Bank as required by federal regulations. The notice is also made a part of this CRA Policy and is attached as Exhibit B.

1.4 COMMUNITY REINVESTMENT ACT POLICY STATEMENT

It is the policy of EnerBank to comply with the spirit and letter of all applicable consumer and fair lending laws. No individual will be denied the services of EnerBank due to discrimination because of race, color, religion, national origin, sex, marital status, age, handicap, familial status, receipt of public assistance, or the exercise, in good faith, of rights granted by the Consumer Credit Protection Act.

Be It Resolved, that the Community Reinvestment Act Policy and Notice be adopted and fully implemented. This CRA Policy shall ensure compliance with all CRA federal guidelines while maintaining the safety and soundness of EnerBank.

The CRA Policy will be reviewed and approved by the Board of Directors on at least an annual basis. Any material changes in the CRA Policy must be acted upon and so noted in the first regular meeting of the Board of Directors following the change.

Any other information deemed necessary by the Board of Directors or management may also be incorporated into the CRA Policy, consistent with the criteria set forth in the Joint Policy Statement on the Community Reinvestment Act.

1.5 PUBLIC FILE

EnerBank will maintain a file related to its CRA activities. The file will be made available to the public upon request at no cost to the requesting party. The public file will be maintained at EnerBank's main office and will include the following information:

- All written comments received from the public for the current year and each of the prior two calendar years that specifically relate to the bank's performance in helping meet community credit needs.
- All responses made by the bank to these written comments made by the public.

- Within 30 days of receipt, a copy of the public section of our most recent CRA performance evaluation.
- A list of the bank's branches including any branches opened or closed within the current year and the two prior calendar years.
- A list of services (including hours of operation, available loan and deposit products, and transaction fees) offered by EnerBank.
- A map of our assessment area.
- EnerBank's loan-to-deposit ratio for each quarter of the prior calendar year.
- Any additional information as applicable.

The CRA Officer will ensure that the information in the public file is current as of April 1 each year.

1.6 DESCRIPTION OF EnerBank USA

EnerBank is a Utah Chartered, federally insured Industrial Bank, located at 1245 E. Brickyard Road, Suite 100, Salt Lake City, Utah.

1.7 CREDIT SERVICES OFFERED

EnerBank will offer closed-end, unsecured fixed interest rate installment loans for the purchase of energy-related home improvements or appliances. These loans will be offered throughout the United States. EnerBank will offer these loans through qualified electric, gas and water utility companies as well as equipment manufacturer distributors, authorized contractors and retail dealers. The loans made by EnerBank will be made to borrowers of different income levels and in differing geographic areas outside the assessment area of Salt Lake County. EnerBank intends to originate a percentage of these loans on a nationwide basis to low-to-moderate income individuals. Loans to first time home buyers and home rehabilitation will also be granted to customers residing in Salt Lake County. EnerBank contemplates participating in the Utah Community Reinvestment Corporation. Loans made to non-profit organizations must be tailored to meet the needs of low- and moderate-income individuals in our community.

1.8 NON-CREDIT SERVICES OFFERED

Non-credit services are limited to offering certificates of deposit.

1.9 BRANCH CLOSINGS AND RELOCATIONS

EnerBank will comply with Section 42 of the Federal Deposit Insurance Act (as added by the Federal Deposit Insurance Corporation Improvement Act of 1991 and amended on September 29, 1994 by section 106 of the Riegle-Neal Interstate Banking and Branching Efficiency Act). EnerBank has developed a written policy to address the opening or closing of branch services in a manner consistent with the intent of CRA.

The CRA Committee will review all major proposed changes in services to ensure that any proposed changes do not have a disproportionate impact on low- and moderate-income neighborhoods.

1.10 INVESTMENT, CONTRIBUTION AND SERVICE

Documentation of EnerBank's investment, contribution and community service efforts, will be maintained. This documentation will include, but not be limited to the following:

- The dollar amount of qualified investments/contributions made.
- A description of the community needs addressed by the investment/contribution.
- A list of services provided to the assessment area, identifying the degree to which the services meet the community's credit and community development needs.

To contribute to EnerBank's CRA performance, a charitable donation should fall into one of the following categories:

- The donation assisted a community development or redevelopment effort.
- The donation helped to inform members of the community about how to obtain or use credit.
- The donation assisted in providing credit services or information to the community.
- The donation assisted a woman or minority-owned small business.
- The donation assisted in providing affordable quality day care.
- The donation assisted a non-profit organization that has as its primary mission the improvement of the quality of life in our community.

1.11 COMMUNITY REINVESTMENT SELF-ASSESSMENT

Although CRA does not require an institution to perform a self-assessment, the Board of Directors is cognizant of the implications of an unsatisfactory CRA rating and the assistance self-assessments can lend in achieving and maintaining compliance. Therefore, EnerBank will continue to perform periodic self-assessments. This assessment will be used to identify any perceived weaknesses in our CRA program and to develop specific plans to address and correct these weaknesses. The focus of the assessment will be on the based upon the Bank's CRA Strategic Plan, which has been approved by the Board of Directors and the Federal Deposit Insurance Corporation.

2.1 INTERNAL ORGANIZATION

EnerBank's policies and procedures reflect its commitment to serving the entire community in a fair and equitable manner. To fully enforce these principles, the following organizational duties are defined:

- EnerBank Board of Directors
- CRA Officer

Board of Directors

Overall responsibility for the formation, approval, and monitoring of all CRA activity is with the Board of Directors. The Board of Directors is designated to perform the following functions:

- Appointment of a CRA Officer
- Provide policy direction and ensure adoption.
- Receive quarterly reports on CRA activities, training, and outreach efforts.
- Evaluate assessment of community needs.
- Annual review of:
 1. CRA policy
 2. Assessment area
 3. CRA Notice
 4. EnerBank's participation in special programs designed to help meet the needs of low-to-moderate income areas of the community
 5. Credit and non-credit services offered by EnerBank.

CRA Officer

The CRA Officer's duties include:

- Maintaining documentation as necessary to support CRA compliance.
- Reporting relevant information to the Board of Directors.
- Performing periodic self-assessments.
- Maintaining contacts with community leaders and groups.
- Coordinating CRA and fair lending training.
- Developing credit and community development programs.
- Developing lending programs to government agencies.
- Monitoring compliance with CRA regulations.

2.2 TRAINING

All employees at EnerBank will participate in CRA/Fair Lending training as part of new hire orientation and at least annually thereafter. The Board of Directors will receive CRA training at least every two years.

REVISION HISTORY

Version No.	Date	Name	Reason
1	May 15, 2002	Lorraine Baily	Document Policy
2	May 15, 2003	Lorraine Baily	Annual Review
3	July 15, 2004	Lorraine Baily	Annual Review
4	March 16, 2006	Lorraine Baily	Revisions to incorporate Policy Statement and minor corrections.